

September 5, 2018

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Emergency Petition of TracFone Wireless, Inc. for an order directing USAC to alter the implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes

Dear Chairman Pai:

I write in support of a recent Emergency Petition submitted to the Federal Communications Commission (FCC) by TracFone Wireless requesting the Commission to direct the Universal Service Administrative Company (USAC) to improve the implementation of the National verifier as to ensure Medicaid recipients throughout the nation have adequate access to essential communications services offered through the Federal Lifeline program.

Passport Health Plan has been engaged with the federal Lifeline Program through its partnership with one of the largest Lifeline providers in Kentucky. Together we have jointly created a seamless enrollment process for the Lifeline program to verify the eligibility of prospective customers through automated means: we utilize database connections that originate from state Medicaid agencies to qualify Medicaid-enrolled individuals for Lifeline benefits.

Currently, there are over 30,000 Medicaid participants of the Lifeline program who are also members of Passport Health Plan. These participants are able to receive a free "health phone" through the Lifeline program that not only provide monthly voice minutes, texts, and data allowances that meet the Commission's minimum service standards for Lifeline, but also provide free appointment reminders and preventative health tips through text messages. Furthermore, these subscribers can make outbound calls to us, their health care provider, free of charge. Therefore, the Lifeline program gives many of our high-risk Medicaid patients not only the ability to stay connected to their loved ones, seek employment, and obtain emergency services at no cost, but also the tools to lead a healthier lifestyle and incentives to be more proactive regarding their healthcare needs.

Indeed, a recent ground-breaking study comparing Medicaid recipients who are participants of the Lifeline program to those who are not confirms many of the positive benefits of the health phone. The study found that active health phone users who have participated in the Lifeline program for at least a year and those with chronic conditions have lower Per Member

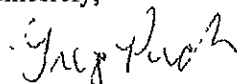
Per Month (PMPM) costs than non-participants. In addition, longer health phone use is associated with lower healthcare costs and utilization, including emergency room visits, hospitalizations, and re-admissions. Importantly, the study found that health phone subscribers are more likely to utilize preventative health services such as getting preventative screenings, flu vaccinations, and smoke cessation. Health phone users with chronic conditions are also more likely to be adhering to their medication. These findings illustrate why Passport Health Plan continues to partner with Lifeline service providers in making the health phone available to our most vulnerable Medicaid customers, and why we strongly support the federal Lifeline program and oppose any effort to make it less available or accessible to those who are otherwise eligible.

We understand that the current carrier-driven eligibility verification process will soon be substituted by the launch of the National Verifier, which aims to further improve Lifeline's program integrity. While we fully support the creation of the National Verifier, USAC's current implementation plan is woefully inadequate regarding the use of automated eligibility verification -- one of the central features of the National Verifier that helps introduce uniformity and standardization into the Lifeline program. Indeed, there have been only partial state or federal database connections established for the soft launch of the National Verifier, with state Medicaid databases not available in three of the six soft-launch states. Instead of establishing connections with other public or private sector sources of Medicaid enrollment data, we understand USAC is intending to proceed with the hard launch of the National Verifier by relying on manual eligibility verification wherever the databases are unavailable. The reliance on a costly, time-consuming, and mistake-prone manual eligibility verification process could greatly undermine the efficiency and efficacy of partnerships between MCOs and Lifeline service providers, undermining Lifeline enrollment by those who qualify through their participation in Medicaid, while introducing new risks for waste, fraud, and abuse that could further undermine, rather than strengthen, the integrity of the Lifeline program.

Passport Health Plan therefore strongly supports TracFone's Emergency Petition and ask the Commission to direct USAC to expeditiously establish state and federal database connections to enable automated eligibility verification for all who qualify prior to the launch of the National Verifier in any given state. Should USAC insist on hard-launching the National Verifier without fully establishing automated verification through databases, Passport Health Plan respectfully ask the Commission to ensure USAC accepts MCO-generated proof of eligibility that result from automatically pinging state Medicaid enrollment database, per the Emergency Petition's request.

Thank you for considering Passport Health Plan's view of USAC's implementation of the National Verifier. We look forward to continuing working with the FCC, USAC, Lifeline service providers as well as other stakeholders in fulfilling the mission of the Lifeline program.

Sincerely,



Greg Pugh, Sr. Director Plan Development & Chief of Staff

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